

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re:

Johnson & Johnson Talcum Powder Products	:	
Marketing's, Sales Practices and Products	:	3:16-md-02738-FLW
Liability Litigation	:	

NOTICE TO TAKE

VIDEOTAPED TRIAL PRESERVATION DEPOSITION

PLEASE TAKE NOTICE that pursuant to Rule 30 of the *Federal Rules of Civil Procedure*, the oral and videotaped deposition of Plaintiff, **BRIDGET GRAVES**, will be taken before a person authorized to administer the oath. This deposition will be videotaped for use at trial and counsel are specifically informed that Plaintiff's health is declining such that she may not available or capable to attend trial; therefore, this deposition is intended to preserve her testimony for use before the jury. The taking of said deposition may be adjourned from day to day until completed.

DATE & TIME OF DEPOSITION: **April 5, 2017, at 10:00 A.M. EST**

LOCATION: **Scarzafava & Basdekis
48 Dietz Street, Suite C
Oneonta, NY 13820**

COURT REPORTER: **Baker Realtime Reporting
& Video Services
250 Commerce Street
Third Floor, Suite One
Montgomery, Alabama 36104
(888) 253-3377**

Respectfully Submitted:

By: /s/ Laurel Li Harris
LAUREL LI HARRIS

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Attorneys for Plaintiffs

Certificate of Service

I, Laurel Li Harris, hereby certify that I caused a copy of the foregoing Notice to Take Videotaped Trial Preservation Deposition to be filed electronically via the court's electronic filing system the 8th day of March, 2017. Those attorneys who are registered with the Court's electronic filing system may access these filings through the court's system, and notices of these filings will be sent to these parties by operation of the court's electronic filing system.

/s/ Laurel Li Harris

LAUREL LI HARRIS